

**BRADFORD ON AVON AREA BOARD  
7 JANUARY 2015**

**DRAFT Air Quality Action Plan for Bradford on Avon**

**1. Purpose of the Report**

1.1 To present a Draft Air Quality Action Plan for Bradford on Avon and to seek comments and endorsement of its content by the Bradford on Avon Area Board.

**2. Background**

2.1 An Air Quality Management Area has been designated in the centre of Bradford on Avon since 2001 due to the exceedence of the annual mean objective for nitrogen dioxide and small particulates. An Air Quality Action Plan was published by West Wiltshire District Council in 2005 but with limited impact.

2.2 In 2012 the Bradford on Avon Air Quality Alliance was formed following a series of public meetings to discuss how to tackle this seemingly intractable problem. This stakeholder body, whose members are drawn from a range of local community groups\*, is chaired by Councillor Rosemary Brown the Chairman of the Bradford on Avon Area Board. The focus of the Alliance's work has been the collection of baseline data on traffic and air quality emissions, including a major study of traffic origin and destination, installation of a real-time air quality analyser and the launch of an interactive air quality website and text alert system. Improved HGV signage directed at reducing unnecessary intrusion from lorries in the town centre has also been implemented.

2.3 The unitary Wiltshire Council is responsible for strategic transport issues via the Core Strategy and the Local Transport Plan and also for improving public health and environmental health outcomes through the Health and Wellbeing Strategy. Community air quality action plans are being prepared by Area Boards in consultation with their local communities.

2.4 Strategies to improve air quality inevitably focus on reducing traffic. However, transport is inextricably linked with wider social, economic and environmental objectives. The challenge of reducing traffic is common to all communities but Wiltshire faces particular issues, being a largely rural county with the attendant challenges around providing public transport.

2.5 Bradford on Avon, however, has good connectivity: a railway station; a through bus route connecting Bath and Salisbury; a circular bus route around the town (Town

Bus); a good network of footpaths. Cycle routes are limited although a potential cycle network has been identified.

2.6 The Air Quality Action Plan has important links to a number of other initiatives:

### **Wiltshire Core Strategy**

2.7 The Core Strategy is shortly to be adopted by Wiltshire Council, following the concluding of the Inspector's examination. It covers the period up to 2026.

2.8 The bulk of new housing due to be delivered in Bradford on Avon is at Kingston Farm with approximately 150 homes. Taking into account planning applications already passed, the Core Strategy expects 'approximately' 27 further new homes to be permitted in the town over the plan period to 2026.

2.9 The Core Strategy recognises the particular infrastructure constraints in the town, especially around traffic congestion.

**Core Policy 55** specifically deals with **Air Quality**:

*“Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and may include:*

- i. landscaping, bunding or separation to increase distance from highways and junctions*
- ii. possible traffic management or highway improvements to be agreed with the local authority*
- iii. abatement technology and incorporating site layout / separation and other conditions in site planning*
- iv. traffic routing, site management, site layout and phasing.*

**Targets:** *No applications permitted contrary to the advice of Wiltshire Council on the grounds of air pollution that cannot be mitigated.*

**Monitoring and Review:** *Air Quality Strategy Implementation Plan.*

**Delivery Responsibility:** *Wiltshire Council.”*

2.10 Core Policy 55 is supported by a Supplementary Planning Document and guidance toolkit for developers.

2.11 Traffic management measures to reduce the adverse impact of cars and HGVs on the town is being pursued through the Wiltshire Local Transport Plan and through the Wiltshire Freight Management Strategy.

## **Connecting Wiltshire**

2.12 The Connecting Wiltshire project provides a travel planning tool to encourage sustainable forms of transport including walking, cycling and public transport. The project has funded bus maps, timetables for the Town Bus and a promotion for the Town Bus, as well as personal travel planners and a roadshow.

## **Car Parking Review**

2.13 Wiltshire Council is currently undertaking a review of its car parking strategy. Local communities are being invited to get consider opportunities for asset transfer and management of their own car parks as well as responsibility for setting local parking charges. If Bradford on Avon was to take on these assets it would be able to tailor its own strategy for long and short-term parking to support local businesses and services. The review documentation contains valuable information pertinent to the town which forms part of the evidence base for the community air quality action plan.

## **Wiltshire Air Quality Action Plan 2014**

2.14 Wiltshire Council has issued a Draft Air Quality Action Plan (AQAP) which outlines the strategic and locally generated actions which will need to be taken in order to improve air quality across the County. It recognises that local Air Quality Action Plans are essential to allow the community to take forward local initiatives, whereas strategic initiatives are dealt with via the Local Transport Plan (LTP3) and the Climate Change Strategy within the Core Strategy. In practice this means that a community-generated Air Quality Action Plan cannot deal with questions of strategic routes or through traffic.

*“The primary source of pollutants in the Wiltshire AQMAs is produced by vehicle emissions. It is recognised that improving air quality in these specific locations is difficult due to the increased use and reliance on private motor vehicles. Finding solutions is, therefore, a challenge for us all to rise to. For action planning to realise its full potential it is important to work with local communities to generate and implement or influence local solutions.”*

2.15 A key achievement in 2014 has been the launch of the Air Quality website, [www.wiltshireairquality.org](http://www.wiltshireairquality.org) which provides real time data on air quality from the monitoring stations in the AQMA's alongside historical data. The website also allows residents to sign up to a 'Know and Respond' service to alert them when emissions levels are high.

## **Bradford on Avon Neighbourhood Plan**

2.16 Work is continuing on the Neighbourhood Plan which will go to public referendum in 2015. The Plan is unlikely to propose housing development much in excess of the Core Strategy numbers. The Plan emphasises the need to facilitate

low-emission transport choices by siting development close to public transport and public amenities and other measures to discourage unnecessary car journeys and to encourage people to walk and cycle instead.

2.17 The Historic Core Zone project seeks to rebalance the streetscape in the centre of the town in favour of pedestrians. This has been a 6-year project which has resulted in detailed designs for the first phase on Market Street and Church Street. The HCZ will be the subject of a Town Poll which we expect to be held in January 2015.

2.18 The project has been assessed by Wiltshire Council for its effect on air quality, and it is deemed that the effect will be neutral. However, improved pedestrian facilities should encourage walking in the town centre thus supporting local shops and services and reducing out-commuting.

### **Traffic Study**

2.19 In June 2013 Wiltshire Council commissioned Atkins to conduct an ANPR Study in Bradford on Avon, as an extension of the Holt Freight Study. Approximately 240,000 vehicle movements were recorded and analysed across a week between 7am – 7pm, and the number plates cross referenced via the DVLA to give registered postcodes for the vehicles.

2.20 The key findings were:

- On an average weekday there are 62730 journeys. On an average Saturday this falls to 48085, a reduction of 30% vs weekdays.
- The busiest spot is the Town Bridge. 16750 journeys are made across the bridge on an average weekday. This falls to 13292 on a Saturday, a reduction of 26% vs weekdays.
- On weekdays the peak times (7-10am and 4-7pm) see an average uplift per hour of around 25% in traffic flow vs the period 10am – 4pm.
- Through journeys account for 16% of total traffic on weekdays, and 15% on Saturdays. It does not all follow the same route; some is north-south and some west-east (and vice versa). Some locations, such as the Town Bridge, have a higher percentage of through traffic since they are on the main A363.
- For all postcoded vehicles, the origins break down as follows (on weekdays):

0-2 miles	17%	2-5 miles	24%
5-25 miles	28%	25-50 miles	4%
50-200 miles	14%	200+ miles	1%
Unknown	12%		

### 3. Action Plan

3.1 The Bradford on Avon Air Quality Alliance has prepared some action plan ideas, below. The Area Board is invited to endorse these and to consider financing the further analysis of the results of the 2013 traffic survey which is needed to give effect to some points in the plan. To facilitate this, Atkins (who undertook the survey) might be asked to provide an estimate of the cost of this extra analysis.

Issue	Evidence	Action	Responsibility	Timing
Residents unaware of up-to-date traffic data, leading to lack of action on own travel choices	Continuing belief in a bypass as the only 'solution'. Belief that through traffic is the major problem	Citizen Action - A 'Clean Air Town': 1. Use community event(s), to include: Display giving traffic study findings; Attendance by Connecting Wiltshire to give public transport info, and demonstrate app; Qualitative research at event to identify where residents feel particularly unsafe as pedestrians/identify barriers to cycling; Specific promotion of Town Bus service – hand out maps and timetables; Potential for local retailers to promote goods/services for which people may currently travel out of town Gather potential uses for community electric minibuses. Give information about Electric Vehicles  2. Produce leaflet with key findings for distribution around town  3. Use social media to raise awareness of the issue	All. Climate Friendly Bradford on Avon happy to run walking/ cycling research tables and discuss community minibuses	January 2015
Parking by commuters driving to work in the town (traffic/travel to work is a factor of economic activity)	Traffic study concentrated on through movements and vehicle postcode origin. Need for further analysis to find out more about these	1. Analyse traffic study data to identify traffic commuting into town and needing parking; and how this divides north and south of the river. From this analysis, examine case for new parking on the edge of town, linked to bus services  2. Encourage local		Commission further traffic study analysis - January 2015

	commuters	employers to promote car sharing/ use of public transport		
Public transport as a genuine alternative: stimulate use of the Town Bus	To be provided by Wiltshire Passenger Transport Services	<p>1. Pocket timetable already designed by CFB and delivered to all households, funded via Connecting Wiltshire campaign</p> <p>2. Audit of bus stops required to target cleaning and maintenance so that information is present and environment is welcoming</p>	Climate Friendly Bradford on Avon	January 2015
Encourage low emission car choice	National sales figures of electric vehicles are increasing but from a low base	Provide information for residents via talks and events	CFB – already held talk in October. Would like to replicate recent Frome EV event	Spring 2015
How to deter Bradford residents from driving into town centre without damaging town centre shops	<p>84% traffic in town starts or ends (or both) journey within town.</p> <p>Need for more information from the traffic survey about town centre traffic, shoppers' movements and the school run.</p>	<p>1. Shop and go deliveries: feasibility study to define potential for delivery services from town centre shops, ideally by electric vehicle. NB Silver Street Pharmacy already has shopping delivery service – potential for pilot project to extend to all shops?</p> <p>2. Measures to make it more feasible/pleasant to walk into town - implement HCZ; build new footbridge</p> <p>3. Encourage walking trains to school and public transport improvements which will prompt parents not to do the 'school run' by car</p> <p>4. Improve parking facilities (especially north of the river, to remove the need for those coming from the north side to drive over the Town bridge and back to find parking)</p>	Designate potential car park sites in BoA Neighbourhood Plan	<p>1. Feasibility study - Spring 2015</p> <p>2. Commission further traffic study analysis - January 2015</p> <p>3. Consult schools - Spring 2015</p>
How to deter Community Area residents	41% of vehicles have postcode origin within 5	<p>1. Shop and go deliveries (as above)</p> <p>2. Review of local bus and</p>		1/2. Spring 2015

from driving into town without damaging shops	miles. Again ,need for more information from the traffic survey	train services and surveys within community area to define need for new services.  3. Improve parking facilities (as above)		
Traffic from Trowbridge – how to mitigate?	15% of all traffic in the town has postcode origin in Trowbridge. Need to know from the traffic survey how much of the traffic from Trowbridge goes on through BoA and how much stops in BoA before returning	Feasibility study for park and ride site on Trowbridge Road - ?Beehive Field. More detailed research on postcode origin to identify catchment within Trowbridge	Designate site in BoA Neighbourhood Plan	Commission further analysis of traffic study - January 2015
Understand road space as a shared resource - centre of town is intimidating for pedestrians, leading to increased car use when walking might be possible	17% of 'matched traffic' in town is registered to an address within 2 miles of centre. Need to find out more about unmatched traffic	Implement all phases of Historic Core Zone	Phase 1 at detailed design stage; subject to Town Poll	Commission further analysis of traffic study - January 15
General need to deter unnecessary traffic	84% of traffic is local or bound to or from BOA	1. Implement HCZ 2. Charge tolls for crossing the Town Bridge 3. Provide new footbridge		
No housing development unless car-free or air quality and health targets are met and developers make contributions to cost of tackling town's traffic/air quality problem	This is a compressed version of Wiltshire Core Policy No 55		Wiltshire Council as planning authority  BoA Neighbourhood Plan and Town Council	

Need to reduce vehicle traffic to/from Sainsburys	Need for more information from the traffic survey about traffic to/from Sainsburys	<ol style="list-style-type: none"> <li>1. Encourage deliveries from Sainsburys</li> <li>2. Consider whether public transport modifications might help.</li> </ol>		Commission further traffic survey analysis - January 15
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#### **4. Implications**

##### **4.1. Environmental Impact of the Proposals**

The BoAAQAP is a piece of work which will help protect the local environment and will have positive impacts environmentally and on climate change. Effective measures to mitigate and adapt to climate change provide clear opportunities to deliver benefits in other areas, for example environmental protection, public health, economic development, transport and resilient communities.

Road traffic is one of the major sources of both greenhouse gas emissions and air pollution. Many of the solutions, including improving sustainable transport networks and green infrastructure, encouraging cycling and walking, and using low-emission vehicles, can help to reduce carbon emissions and to improve air quality. Therefore there are clear benefits to ensuring consistency between strategies and action plans on air quality and on climate change.

Work to reduce CO<sub>2</sub> by reducing energy consumption will ultimately contribute towards improving air quality. Wiltshire Council's Green Economy Team are working with communities to reduce the county's carbon footprint. Identifying and developing linkages between the work of the Public Protection, Public Health, Sustainable Transport and Spatial Planning Teams will help to progress projects that can satisfy a number of different environmental objectives.

##### **4.2. Financial Implications**

There are no direct financial implications arising from the adoption of the BoAAQAP itself, although a number of projects are identified, such as public awareness campaigns and feasibility studies, which will require modest financial support from the public authorities.

Whilst some improvements to traffic related air quality can be delivered at little cost other infrastructure schemes may require significant capital investment. Funding and the delivery mechanism will be part of the Local Transport Plan 3 and will also include the Highways Agency and the Core Strategy. Other funding will be sought through the planning regime including Section 106 agreements and CIL money.



### **4.3. Legal Implications**

It is a legal requirement for Wiltshire Council to prepare and consult on Air Quality Action Plans where Air Quality Management Areas are in place. Adoption of the BoAAQAP will contribute to the Council achieving compliance with its duties under the Environment Act 1995 Part IV. There is a risk of legal challenge if the Action Plan is not adopted.

### **4.4. Equality and Diversity Implications**

Regard has been had to Wiltshire Council's policies on diversity and equality. The BoAAQAP is classed as being "low relevance" within the Corporate Equality Impact Assessment Framework, however it will be applied having regard to legislative duties, Council policy and other relevant officer Codes of Conduct.

## **5. Recommendation**

It is recommended that:

- i) The Bradford on Avon Air Quality Action Plan is endorsed by the Bradford on Avon Area Board
- ii) Any agreed amendments are incorporated into the plan and the document is formally submitted to Wiltshire Council and the Department for Environment Food and Rural Affairs
- iii) Annual progress updates with implementation of the Action Plan will be reported to the Area Board.

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### **\*Stakeholder members of the Bradford on Avon Air Quality Alliance Steering Group**

Bradford on Avon Area Board; Bradford on Avon Town Council; Climate Friendly Bradford on Avon; Bradford on Avon Preservation Trust; Bradford on Avon Development Trust; Bradford on Avon Seniors Forum; Bradford on Avon Community Area Network (BoACAN)